



State of New Mexico
ENVIRONMENT DEPARTMENT



Hazardous Waste Bureau

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CERTIFIED MAIL – RETURN RECEIPT REQUESTED

December 21, 2017

Mark Patterson
BRAC Environmental Coordinator
Fort Wingate Depot Activity
13497 Elton Road
North Lima, OH 44452

Steve Smith
USACE
CESWF-PER-DD
819 Taylor Street, Room 3B06
Fort Worth, TX 76102

**RE: DISAPPROVAL
FINAL GROUNDWATER SUPPLEMENTAL RCRA FACILITY
INVESTIGATION WORK PLAN REVISION 3
FORT WINGATE DEPOT ACTIVITY
MCKINLEY COUNTY, NEW MEXICO
EPA ID# NM6213820974
HWB-FWDA-15-001**

Dear Messrs. Patterson and Smith:

The New Mexico Environment Department (NMED) is in receipt of the Fort Wingate Depot Activity's (Permittee) *Final Groundwater Supplemental RCRA Facility Investigation Work Plan Revision 3* (Work Plan), dated December 8, 2017. NMED has reviewed the Work Plan and hereby issues this Disapproval. The Permittee must address the following comments.

1. The Permittee's Response to Comment 1. b of the Disapproval

Permittee Statement: "Figure 2-1 has been revised to include new proposed well MW34 to replace the abandoned well FW26."

NMED Comments: The location of the proposed well MW34 is depicted downgradient of SWMU 9, the Petroleum, Oil, and Lubricant (POL) Waste Discharge Area in Figure 2-1. The 2014 visual delineation and soil investigation identified that the actual area of POL

disposal was located southeast of the original SWMU 9 boundaries according to *Final RCRA Facility Investigation Report Parcel 7*, dated March 30, 2017. The proposed location of well MW34 in Figure 2-1, *Alluvial Contaminant Plumes and Proposed Alluvial Well Locations*, does not address the contamination discovered during the 2014 investigation. Propose to install well MW34 downgradient of the actual POL disposal area. Since the Permittee plans to remove the impacted soils from the actual POL area, the proposed location of well MW34 must be placed outside of the anticipated excavation boundary. Revise the Work Plan to depict an appropriate location of the proposed well MW34.

2. The Permittee's Response to Comment 1. d of the Disapproval

Permittee Statement: "*Fort Wingate Depot Activity Groundwater Monitoring Northern Area Background Well Installation Letter Work Plan*, submitted to NMED on October 31, 2017, outlines the rationale and installation of four additional bedrock background monitoring wells."

NMED Comment: The referenced Letter Work Plan only addresses background wells for the bedrock aquifers. Since anthropogenic constituents (e.g., perchlorate, nitrate) have been detected in alluvial background monitoring wells BGMW02 and BGMW03, the wells may not provide accurate background data for alluvial groundwater conditions; these wells have been serving as sentinel rather than background wells. The Permittee must propose to install a minimum of two additional alluvial background monitoring wells to replace wells BGMW02 and BGMW03. In the revised Work Plan, propose to install and also provide a justification for the selected locations of proposed alluvial background monitoring wells.

3. Table 3-1, New Groundwater Monitoring Well Rationale and Sampling Matrix

NMED Comment: During a conference call between Army and NMED on November 17, 2017, soil sampling results in SWMU 2 (Acid Pond) were discussed. During the discussion, it was concluded that chromium may be leaching into groundwater; therefore, further investigation is warranted. Although the original purpose of proposed alluvial well TMW57 is described to determine the southwestern boundary of perchlorate contamination within the alluvial water-bearing zone according to Table 3-1, the well must also address the concern of potential leaching of chromium from SWMU 2 (Acid Pond), since the location of the well is depicted closest from the SWMU 2 boundary in Figure 2-1. Revise the Work Plan to state the additional purpose of proposed well TMW57 in Table 3-1. In addition, the Permittee must revise the location of the well TMW57 slightly south (near the Building 515); propose to install well TMW57 inside of the SWMU 2 boundary, where the highest chromium concentrations were detected. Revise Figure 2-1 to depict an appropriate location of the proposed well TMW57.

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The Permittee must submit a revised Work Plan that addresses all comments contained in this Disapproval. In addition, the Permittee must include a response letter that cross-references where NMED's numbered comments were addressed. The Permittee must also submit an electronic redline-strikeout version of the revised Work Plan showing where all changes have been made to the Work Plan. The revised Work Plan must be submitted no later than **March 23, 2018**.

Should you have any questions, please contact Ben Wear of my staff at (505) 476-6041.

Sincerely,



John E. Kieling
Chief
Hazardous Waste Bureau

cc: D. Cobrain, NMED HWB
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